

**EXHIBIT 1**

Add'l Excerpts of Dep. of Kimberly P. Turner

Kimberly Turner - September 26, 2012

7

1           A     Similar issues to this case.

2           Q     Okay. About how much time would you say  
3 you spent preparing for today's deposition?

4           A     Four hours.

5           Q     Okay. And aside from the attorney for the  
6 State, did you meet or discuss this deposition with  
7 anyone else?

8           A     No.

9           Q     Can you -- what's your current job title?

10          A     As of today, I'm the senior attorney for  
11 the Elections Division of the Secretary of State.

12          Q     And that -- you're literally that as of  
13 today?

14          A     Today, I say that because effective  
15 November 1st, I will be the Assistant Secretary of  
16 State for the Elections Division of the Secretary of  
17 State's Office.

18          Q     Congratulations.

19          A     Thank you. Any opportunity I get to bring  
20 that up.

21          Q     So how long have you been the senior  
22 attorney then?

23          A     Since June 1st of this year.

24          Q     And before June 1st of this year, what was  
25 your job title?

Kimberly Turner - September 26, 2012

14

1           A     It's a person or group of persons that  
2     forms for purposes of -- uh -- either supporting or  
3     not supporting a political candidate or a ballot  
4     measure, whether it be local, county or a  
5     constitutional initiative on a state-wide level.

6           I believe a more adequate definition is  
7     statutory. So it would be in the code.

8           Q     Are you aware that there are two different  
9     definitions of political committee that apply to  
10    ballot measure committees?

11          A     I'm aware that there are two different  
12    sections in the code -- one that pertains to ballot  
13    measure committees that would not be constitutional  
14    initiatives. The 23-17 series pertains solely to  
15    constitutional initiatives. And then the 23-15  
16    series would pertain to candidates and to other  
17    ballot measures like we discussed earlier, on a  
18    local level, county or municipality.

19          Q     Does a ballot measure committee, speaking  
20    about constitutional initiatives in Mississippi?  
21    I'm sorry. Let me strike that and try that a little  
22    bit better.

23                You said the 23-17 series only applied to  
24    ballot measure committees speaking about  
25    constitutional initiatives; is that correct?

Kimberly Turner - September 26, 2012

15

1 A Correct.

2 Q Okay. Do ballot measure committees  
3 speaking about constitutional initiatives in  
4 Mississippi also fall under the 23-15 definition of  
5 political committee?

6 A They will for purposes of enforcement.  
7 23-15-813 would address those political committees,  
8 as well, and there's a reference to 23-15-813 in the  
9 23-17 series.

10 Q Okay. So does the definition of political  
11 committee at 23-15-801 (c) encompass ballot measure  
12 committees that are speaking about constitutional  
13 initiatives?

14 A No.

15 Q Are you familiar with the term "threshold"  
16 as it applies to campaign finance laws?

17 A Yes.

18 Q What is your understanding of the term  
19 "threshold"?

20 A A minimum.

21 Q Mississippi has a \$200 threshold?

22 A Correct.

23 Q Okay.

24 A I believe it's -- you're right, it's 200.

25 Q Okay. And just to be clear, a two hundred